

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WILLIAM JOSEPH WEBB, JR.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C. A. No. 07-31 – GMS
	:	
FIRST CORRECTIONAL MEDICAL,	:	
CORRECTIONAL MEDICAL SERVICES,	:	TRIAL BY JURY OF TWELVE
GOVERNOR RUTH ANN MINNER,	:	DEMANDED
COMMISSIONER STANLEY W. TAYLOR,	:	
BUREAU CHIEF PAUL W. HOWARD,	:	
MS. GINA WOLKEN,	:	
DR. ALI, DR. NIAZ, DR. JOHN DOE,	:	
DR. ANE DOE, CORRECTIONAL MEDICAL	:	
SERVICES GRIEVANCE HEARING STAFF,	:	
MS. ROSALIE VARGAS,	:	
JOHN DOE, AND JANE DOE,	:	
	:	
Defendants.	:	

**CORRECTIONAL MEDICAL SERVICES' SUPPLEMENTAL RESPONSES TO
PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS
(RELATED DOCKET #69)**

COMES NOW, Correctional Medical Services pursuant to Fed. R. Civ. P. 26(e) to hereby supplement the responses to the Requests for Production of Documents previously submitted (D.I. 69) as follows:

1. That Defendant produce and permit Plaintiff to inspect and to copy each of the following documents:

(n) A complete copy of insurance information/policies.

RESPONSE: A copy of the Everest Indemnity Claims Made Insurance Policy # 6500000222-061 is attached hereto. This policy is being produced to you as a CONFIDENTIAL DOCUMENT under the terms and conditions of the Confidentiality Agreement that you executed on August 13, 2007.

Marks, O'Neill, O'Brien & Courtney, P.C.

By: /s/ Eileen M. Ford, Esquire #2870
Eileen M. Ford, Esquire/ID No. 2870
Megan T. Mantzavinos, Esquire/ID No. 3802
913 North Market Street, #800
Wilmington, DE 19801
(302) 658-6538
Attorneys for Defendants

DATED: February 8, 2008

**SEALED
DOCUMENT**

CERTIFICATE OF SERVICE

I, **Eileen M. Ford, Esquire**, hereby certify that on **February 8, 2008** I electronically filed **Correctional Medical Services' Supplemental Response to Plaintiff's Request for Production fo Documents**, with the Clerk of Court using CM/ECF which will send notification of such filing(s) to Catherine Damavandi, Esquire. I have served via first class mail two copies of foregoing to the Pro Se Plaintiff as follows:

William Joseph Webb, Jr., pro se
SBI#256056
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977
Via First Class US Mail

/s/ Eileen M. Ford

Eileen M. Ford, Esquire (ID No. 2870)
Marks, O'Neill, O'Brien & Courtney, P.C.
913 North Market Street, #800
Wilmington, DE 19801
(302) 658-6538
*Attorney for Defendant Correctional
Medical Services, Inc.*